

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

**FEDERAL RESERVE BANK OF SAN  
FRANCISCO,**

Plaintiff

v.

**OTO ANALYTICS, LLC; BENWORTH  
CAPITAL PARTNERS PR, LLC;  
BENWORTH CAPITAL PARTNERS, LLC;  
BERNARDO NAVARRO and CLAUDIA  
NAVARRO,**

Defendants.

Civil No. 23-01034 (GMM) *cons.*

Civil No. 24-01313 (GMM)

**MOTION TO RESTRICT VIEWING LEVEL**

**TO THE HONORABLE COURT:**

**COME NOW** defendants Benworth Capital Partners PR, LLC (“Benworth PR”), Benworth Capital Partners, LLC (“Benworth FL”), and Bernardo and Claudia Navarro (“Mr. and Mrs. Navarro” and, jointly with Benworth PR and Benworth FL, the “Defendants”), through the undersigned counsel, and very respectfully state and pray as follows:

1. The Defendants are filing today a “Motion Submitting Unsworn Statement of Bernardo Navarro in support of Defendants’ Unopposed Motion for Extension of Time to Comply with the Court’s Discovery Order [DE 245]” (the “Motion”).

2. The Motion attaches as Exhibit A the unsworn statement of Bernardo Navarro, which provides further details on a technical issue that Benworth FL experienced and that necessitated an extension of time to produce an export of Defendants’ QuickBooks data to Plaintiff-Intervenor, the Federal Reserve Bank of San Francisco. The technical issue is of a

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confidential and sensitive nature and remains subject to an ongoing investigation. Publicly revealing the limited known details surrounding the technical issue at this time may expose Defendants to further harm. Considering that the details surrounding the technical issue do not relate to the merits of this action, Defendants' interest in maintaining as confidential the details of the technical issue until the investigation is complete, outweighs the public interest's in learning the circumstances surrounding Defendants' request for an extension to comply with a discovery order.

3. Out of an abundance of caution, the Defendants respectfully request that viewing of Exhibit A attached to the Motion be restricted to case participants and court personnel ("Parties").

4. Accordingly, and subject to the Court's approval of this motion, the Defendants will file Exhibit A of the Motion under the appropriate filing and viewing level restricted to case participants and court personnel ("Parties").

**WHEREFORE**, Defendants file the present motion in compliance with Standing Order No. 9, requesting that the Court take notice of the above and grant their request to file Exhibit A of the Motion under the appropriate restricted filing and viewing level ("Parties") as detailed above.

**CERTIFICATE OF SERVICE:** We hereby certify that on this same date the foregoing reply was filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all attorneys and participants of record.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 28<sup>th</sup> day of May, 2025.

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